

EXHIBIT D

IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION

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WSOU INVESTMENTS, LLC, d/b/a	*	Case No. 6:20-cv-01012
BRAZOS LICENSING AND	*	Case No. 6:20-cv-01013
DEVELOPMENT	*	Case No. 6:20-cv-01014
	*	Case No. 6:20-cv-01015
Plaintiff,	*	Case No. 6:20-cv-01016
	*	Case No. 6:20-cv-01017
v.	*	Case No. 6:20-cv-01018
TP-LINK TECHNOLOGY CO., LTD.,	*	Case No. 6:20-cv-01019
	*	Case No. 6:20-cv-01020
	*	Case No. 6:20-cv-01021
	*	Case No. 6:20-cv-01022
	*	
	*	Hon. Alan D. Albright
	*	
	*	Complaints Filed: 10/31/2020
	*	

* * * * *

OBJECTIONS TO DOCUMENT SUBPOENA TO
FOLEY & LARDNER LLP

Pursuant to Rule 45 of the Federal Rules of Civil Procedure, Foley & Lardner LLP hereby objects to the Subpoena to Produce Documents, Information, or Objects or to Permit Inspection of Premises in a Civil Action served on it by plaintiff Wsou Investments, LLC in the above-captioned matters (the “Present Cases”).

General Objections

1. Foley & Lardner LLP objects to the Subpoena because it attempts to impose duties on Foley & Lardner LLP that reach beyond any obligation imposed on it by any applicable law, rule or order. Foley & Lardner LLP is not a party to the Present Cases and it is well established that non-parties are afforded greater protection from discovery and the undue burden and expense that it incurs than is a party, especially in circumstances in which the information sought is at least equally obtainable from a party.

2. *Scope.* Foley & Lardner LLP objects to the Subpoena's scope, insofar it seeks to impose discovery obligations beyond those required by the Federal Rules of Civil Procedure. Foley & Lardner LLP further objects to the document requests in the Subpoena because they impose an undue burden and expense on Foley & Lardner LLP. *See Fed. R. Civ. P. 45(d)(1).*

3. *Relevance.* Foley & Lardner LLP objects to the Subpoena to the extent it seeks information, documents, or things that are neither relevant to the subject matter of the Present Cases nor reasonably calculated to lead to the discovery of admissible evidence.

4. *Document Production.* Foley & Lardner LLP objects to the requests for production as subjecting Foley & Lardner LLP to an undue burden or expense.

5. *Privilege and Immunity.* Foley & Lardner LLP objects to the Subpoena to the extent it seeks production of information, documents, or things protected by the attorney-client privilege, attorney work-product immunity, common-interest privilege, or any other applicable privilege or immunity.

6. *Definitions.* Foley & Lardner LLP objects to the Subpoena's definitions to the extent that they: (i) are unclear, ambiguous, overbroad, unduly burdensome, and unintelligible; (ii) are inconsistent with the ordinary and customary meaning of the words or phrases they purport to define; or (iii) seek to impose obligations different from, or in excess of, those created by the Federal Rules and the Local Rules.

7. *Confidential Information.* Foley & Lardner LLP objects to the Subpoena to the extent that it seeks documents or information that is subject to an obligation of confidentiality to a third party.

Specific Objections

Foley & Lardner LLP incorporates by reference the General Objections set forth above into each of the discovery responses below, whether or not repeated therein, as well as any specific stated objections. A General Objection may be repeated for emphasis or some other reason, but the failure to repeat any General Objection does not waive any General Objection to

the requests for production. Subject to and without waiving the General Objections set forth above, Foley & Lardner LLP responds to each request as follows:

Request No. 1

All correspondence between Foley and TP-Link (China) relating in any way to the summons, complaint and Patents-in-Suit for the present cases.

Objection to Request No. 1

Foley & Lardner LLP objects to this request on the grounds that it does not seek information relevant to any claim or defense. Foley & Lardner LLP further objects to this request to the extent it seeks disclosure of privileged communications, including attorney-client privilege, attorney work-product immunity, common-interest privilege, or any other applicable privilege or immunity product immunity, common-interest privilege, or any other applicable privilege or immunity. Foley & Lardner LLP further objects to this request on the grounds that it is premature because the requested information can be, and should have been sought from Defendant, a route that would be more convenient, less burdensome, and less expensive than seeking the information from Foley & Lardner LLP. Under Rule 26 of the Federal Rules of Civil Procedure, a party may not seek discovery from any source before the parties have conferred as required thereunder. Foley & Lardner LLP understands from the docket that Fish & Richardson PC has specially appeared on behalf of Defendant, but Foley & Lardner LLP is not aware that the parties have yet met and conferred under Rule 26.

Request No. 2

All correspondence between Foley and TP-Link (US) relating in any way to the summons, complaint and Patents-in-Suit for the present cases.

Objections to Request No. 2

Foley & Lardner LLP objects to this request on the grounds that it does not seek information relevant to any claim or defense. Foley & Lardner LLP further objects to this request to the extent it seeks disclosure of privileged communications, including attorney-client privilege, attorney work-product immunity, common-interest privilege, or any other applicable

privilege or immunity product immunity, common-interest privilege, or any other applicable privilege or immunity. Foley & Lardner LLP further objects to this request on the grounds that it is premature because the requested information can be, and should have been sought from Defendant, a route that would be more convenient, less burdensome, and less expensive than seeking the information from Foley & Lardner LLP. Under Rule 26 of the Federal Rules of Civil Procedure, a party may not seek discovery from any source before the parties have conferred as required thereunder. Foley & Lardner LLP understands from the docket that Fish & Richardson PC has specially appeared on behalf of Defendant, but Foley & Lardner LLP is not aware that the parties have yet met and conferred under Rule 26.

Request No. 3

All internal correspondence between anyone at Foley relating in any way to the summons, complaint and Patents-in-Suit for the present cases.

Objections to Request No. 3

Foley & Lardner LLP objects to this request on the grounds that it does not seek information relevant to any claim or defense. Foley & Lardner LLP further objects to this request to the extent it seeks disclosure of privileged communications, including attorney-client privilege, attorney work-product immunity, common-interest privilege, or any other applicable privilege or immunity product immunity, common-interest privilege, or any other applicable privilege or immunity. Foley & Lardner LLP further objects to this request on the grounds that it is premature because the requested information can be, and should have been sought from Defendant, a route that would be more convenient, less burdensome, and less expensive than seeking the information from Foley & Lardner LLP. Under Rule 26 of the Federal Rules of Civil Procedure, a party may not seek discovery from any source before the parties have conferred as required thereunder. Foley & Lardner LLP understands from the docket that Fish & Richardson PC has specially appeared on behalf of Defendant, but Foley & Lardner LLP is not aware that the parties have yet met and conferred under Rule 26.

Dated: January 22, 2021

Respectfully Submitted,

FOLEY & LARDNER LLP

By: /s/ Stephen Smerek

Stephen R. Smerek
Foley & Lardner LLP
555 S. Flower St., Suite 3300
Los Angeles, CA 90071
(213) 972-4508
ssmerek@foley.com

CERTIFICATE OF SERVICE

I hereby certify that on the 22nd day of January 2021, I served the foregoing to all counsel of record via email.

By: /s/ Stephen Smerek
Stephen R. Smerek

UNITED STATES DISTRICT COURT
for the
Western District of Texas

WSOU INVESTMENTS, LLC _____

Plaintiff _____

v. _____

TP-LINK TECHNOLOGY CO., LTD. _____

Defendant _____

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Civil Action No. 6:20-cv-01012

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Foley & Larder LLP, 777 E Wisconsin Ave, Milwaukee, WI 53202 (by and through its registered agent: Corporation Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701)

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

See attached Exhibit A

Place: The Mort Law Firm, PLLC 100 Congress Ave, Suite 2000 Austin, Texas 78701	Date and Time: 02/08/2021 5:00 pm
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Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 01/08/2021

CLERK OF COURT

OR

/s/ Raymond W. Mort, III

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (*name of party*) _____
WSOU INVESTMENTS, LLC _____, who issues or requests this subpoena, are:

Raymond W. Mort, III, raymort@austinlaw.com, 512-865-7950

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

UNITED STATES DISTRICT COURT
for the
Western District of Texas

WSOU INVESTMENTS, LLC _____

Plaintiff _____)

v. _____)

TP-LINK TECHNOLOGY CO., LTD. _____)

Defendant _____)

Civil Action No. 6:20-cv-01013

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
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CLERK OF COURT

OR

/s/ Raymond W. Mort, III

Signature of Clerk or Deputy Clerk

Attorney's signature

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UNITED STATES DISTRICT COURT
for the
Western District of Texas

WSOU INVESTMENTS, LLC _____

Plaintiff _____

v. _____

TP-LINK TECHNOLOGY CO., LTD. _____

Defendant _____

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Civil Action No. 6:20-cv-01014

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(Name of person to whom this subpoena is directed)

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Date: 01/08/2021

CLERK OF COURT

OR

/s/ Raymond W. Mort, III

Signature of Clerk or Deputy Clerk

Attorney's signature

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UNITED STATES DISTRICT COURT
for the
Western District of Texas

WSOU INVESTMENTS, LLC _____

Plaintiff _____

v. _____

TP-LINK TECHNOLOGY CO., LTD. _____

Defendant _____

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Civil Action No. 6:20-cv-01015

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UNITED STATES DISTRICT COURT
for the
Western District of Texas

WSOU INVESTMENTS, LLC _____

Plaintiff _____

v. _____

TP-LINK TECHNOLOGY CO., LTD. _____

Defendant _____

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Civil Action No. 6:20-cv-01016

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Date: 01/08/2021

CLERK OF COURT

OR

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Signature of Clerk or Deputy Clerk

Attorney's signature

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UNITED STATES DISTRICT COURT
for the
Western District of Texas

WSOU INVESTMENTS, LLC _____

Plaintiff _____

v. _____

TP-LINK TECHNOLOGY CO., LTD. _____

Defendant _____

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Civil Action No. 6:20-cv-01017

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UNITED STATES DISTRICT COURT
for the
Western District of Texas

WSOU INVESTMENTS, LLC _____

Plaintiff _____)

v. _____)

TP-LINK TECHNOLOGY CO., LTD. _____)

Defendant _____)

Civil Action No. 6:20-cv-01018

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

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UNITED STATES DISTRICT COURT
for the
Western District of Texas

WSOU INVESTMENTS, LLC _____

Plaintiff _____

v. _____

TP-LINK TECHNOLOGY CO., LTD. _____

Defendant _____

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Civil Action No. 6:20-cv-01019

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

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Date: 01/08/2021

CLERK OF COURT

OR

/s/ Raymond W. Mort, III

Signature of Clerk or Deputy Clerk

Attorney's signature

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UNITED STATES DISTRICT COURT
for the
Western District of Texas

WSOU INVESTMENTS, LLC _____

Plaintiff _____

v. _____

TP-LINK TECHNOLOGY CO., LTD. _____

Defendant _____

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Civil Action No. 6:20-cv-01020

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
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UNITED STATES DISTRICT COURT
for the
Western District of Texas

WSOU INVESTMENTS, LLC _____

Plaintiff _____

v. _____

TP-LINK TECHNOLOGY CO., LTD. _____

Defendant _____

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Civil Action No. 6:20-cv-01021

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

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---	--------------------------------------

Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
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The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 01/08/2021

CLERK OF COURT

OR

/s/ Raymond W. Mort, III

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (*name of party*) _____
WSOU INVESTMENTS, LLC _____, who issues or requests this subpoena, are:

Raymond W. Mort, III, raymort@austinlaw.com, 512-865-7950

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

UNITED STATES DISTRICT COURT
for the
Western District of Texas

WSOU INVESTMENTS, LLC _____

Plaintiff _____

v. _____

TP-LINK TECHNOLOGY CO., LTD. _____

Defendant _____

)
)
)
)
)

Civil Action No. 6:20-cv-01022

**SUBPOENA TO PRODUCE DOCUMENTS, INFORMATION, OR OBJECTS
OR TO PERMIT INSPECTION OF PREMISES IN A CIVIL ACTION**

To: Foley & Larder LLP, 777 E Wisconsin Ave, Milwaukee, WI 53202 (by and through its registered agent: Corporation Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701)

(Name of person to whom this subpoena is directed)

Production: YOU ARE COMMANDED to produce at the time, date, and place set forth below the following documents, electronically stored information, or objects, and to permit inspection, copying, testing, or sampling of the material:

See attached Exhibit A

Place: The Mort Law Firm, PLLC 100 Congress Ave, Suite 2000 Austin, Texas 78701	Date and Time: 02/08/2021 5:00 pm
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Inspection of Premises: YOU ARE COMMANDED to permit entry onto the designated premises, land, or other property possessed or controlled by you at the time, date, and location set forth below, so that the requesting party may inspect, measure, survey, photograph, test, or sample the property or any designated object or operation on it.

Place:	Date and Time:
--------	----------------

The following provisions of Fed. R. Civ. P. 45 are attached – Rule 45(c), relating to the place of compliance; Rule 45(d), relating to your protection as a person subject to a subpoena; and Rule 45(e) and (g), relating to your duty to respond to this subpoena and the potential consequences of not doing so.

Date: 01/08/2021

CLERK OF COURT

OR

/s/ Raymond W. Mort, III

Signature of Clerk or Deputy Clerk

Attorney's signature

The name, address, e-mail address, and telephone number of the attorney representing (*name of party*) _____
WSOU INVESTMENTS, LLC _____, who issues or requests this subpoena, are:

Raymond W. Mort, III, raymort@austinlaw.com, 512-865-7950

Notice to the person who issues or requests this subpoena

If this subpoena commands the production of documents, electronically stored information, or tangible things or the inspection of premises before trial, a notice and a copy of the subpoena must be served on each party in this case before it is served on the person to whom it is directed. Fed. R. Civ. P. 45(a)(4).

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
WACO DIVISION**

WSOU INVESTMENTS, LLC, d/b/a
BRAZOS LICENSING AND
DEVELOPMENT,

Plaintiff,

v.

TP-LINK TECHNOLOGY CO., LTD,

Defendant.

§ Case No. 6:20-cv-01012
§ Case No. 6:20-cv-01013
§ Case No. 6:20-cv-01014
§ Case No. 6:20-cv-01015
§ Case No. 6:20-cv-01016
§ Case No. 6:20-cv-01017
§ Case No. 6:20-cv-01018
§ Case No. 6:20-cv-01019
§ Case No. 6:20-cv-01020
§ Case No. 6:20-cv-01021
§ Case No. 6:20-cv-01022
§
JURY TRIAL DEMANDED
§

NOTICE OF DOCUMENT SUBPOENA TO FOLEY & LARDNER LLP

TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE of the attached Subpoena from Plaintiff WSOU Investments, LLC by and through its counsel, to Foley & Lardner LLP, by and through its registered agent: Corporation Service Company, 211 E. 7th Street, Suite 620, Austin, Texas 78701.

Pursuant to Rules 34 and 45 of the Federal Rules of Civil Procedure, Plaintiff WSOU Investments, LLC seeks the production of documents, electronically stored information, and things from Foley & Lardner LLP by February 8, 2021 at 5:00 pm. A true and correct copy of the Subpoena is attached.

Dated: January 8, 2021

Respectfully submitted,

By: /s/ Raymond W. Mort, III
Raymond W. Mort, III
Texas State Bar No. 00791308
THE MORT LAW FIRM, PLLC
100 Congress Avenue
Suite 2000
Austin, Texas 78701
Tel/Fax: (512) 677-6825
Email: raymort@austinlaw.com

Adam G. Price
Texas State Bar No. 24027750
Christopher V. Goodpastor
Texas State Bar No. 00791991
Gregory S. Donahue
Texas State Bar No. 24012539
DINOVO PRICE LLP
7000 N. MoPac Expressway
Suite 350
Austin, Texas 78731
Telephone: (512) 539-2626
Facsimile: (512) 539-2627
Email: aprice@dinovoprice.com
cgoodpastor@dinovoprice.com
gdonahue@dinovoprice.com

**ATTORNEYS FOR PLAINTIFF
WSOU INVESTMENTS, LLC d/b/a
BRAZOS LICENSING AND
DEVELOPMENT**

CERTIFICATE OF SERVICE

I hereby certify that on the 8th day of January 2021, I served the foregoing to all counsel of record via email.

/s/ Raymond W. Mort, III
Raymond W. Mort, III

EXHIBIT A
REQUESTS FOR PRODUCTION

I. DEFINITIONS

1. “Patents-in-Suit” shall refer to the following U.S. Patents: 6,581,121, 7,174,180, 7,333,770, 7,447,767, 7,652,988, 7,751,423, 7,965,726, 8,094,726, 8,094,573, 8199,636, 8,451,839, 8,774,790, 9,226,305, and 9,548,977.

2. The “present cases” shall refer to the following cases between Plaintiff and Defendant filed in the Western District of Texas, Waco Division, on October 31, 2021: Case Nos. 6:20-cv-01012, 6:20-cv-01013, 6:20-cv-01014, 6:20-cv-01015, 6:20-cv-01016, 6:20-cv-01017, 6:20-cv-01018, 6:20-cv-01019, 6:20-cv-01020, 6:20-cv-01021, and 6:20-cv-01022.

3. “TP-Link (China)” shall refer to Defendant, TP-Link Technology Co. Ltd., and TP-Link Technologies Co., Ltd. (联洲技术有限公司).

4. “TP-Link (US)” shall refer to TP-Link USA Corporation.

5. “Foley & Lardner LLP” shall mean you and anyone working at Foley & Lardner LLP, including but not limited to: Mr. Stephen R. Smerek (ssmerek@foley.com) and Ms. Tiffany K. Sung (tsung@foley.com),

II. REQUESTS

1. All correspondence between Foley and TP-Link (China) relating in any way to the summons, complaint and Patents-in-Suit for the present cases.

2. All correspondence between Foley and TP-Link (US) relating in any way to the summons, complaint and Patents-in-Suit for the present cases.

3. All internal correspondence between anyone at Foley relating in any way to the summons, complaint and Patents-in-Suit for the present cases.